

Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Rita Sethi <rsethi@stollglickman.com>

Wed 1/24/2024 4:52 PM

To:Emanuel Kataev <Emanuel@mllaborlaw.com>;Andrew Stoll <astoll@stollglickman.com>

Cc:Joseph Labuda <joe@mllaborlaw.com>;David Aminov <daminov@mllaborlaw.com>

Emanuel,

Thank you for the meet and confer yesterday.

Depositions

- Frank Russo, Jr.: You represent him and will confirm his availability for any of the following dates: 2/12, 2/16, 2/19 since the dates we previously offered have now passed. You indicated that you would reach out yesterday to your client. Do you have a confirmation on any of the above dates?
- Jaclyn Ceparano and Joanna Russo: You are not able to reach either of these witnesses but would offer to represent them if they make contact with you. You have indicated that we must serve subpoenas on them.
- Danielle Silva: Both parties will continue to search for contact information so that she can be deposed.

It is Defendants' position that all depositions taking place after January 15, 2024 must be so-ordered by Judge Pollak.

Written Discovery

- Defendants will serve their privilege log by January 30, 2024 which will clarify whether you are withholding documents in your Responses to each of Plaintiff's Requests for Document Production.
- Defendants will serve revised Interrogatory Responses by January 30, 2024.
- Defendants will provide any insurance claim related to a flood at Russo's as described in Michael Russo's statement.
- After discussion and narrowing of Plaintiff's Requests, you indicated that you would go back to your client regarding the following Requests for Document Production: 5, 7, 10, 19, 21, 28, and 29. Any productions would be Reports generated within existing computer programs and applications and will not be created uniquely for the purpose of litigation.
- The parties do not agree as to who should bear the \$1500 cost for assembling Russo's payroll records for Robbie Russo.

Best,
Rita

Rita A. Sethi
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From: Emanuel Kataev <Emanuel@mllaborlaw.com>

Sent: Tuesday, January 23, 2024 3:47 PM

To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>

Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>

Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Dear Rita:

Please see attached per our telephonic meet-and-confer today. You or I will memorialize what we discussed under separate cover.

Best,

Emanuel Kataev, Esq.

Partner

Milman Labuda Law Group PLLC

3000 Marcus Avenue, Suite 3W8

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From: Emanuel Kataev

Sent: Monday, January 22, 2024 2:27 PM

To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>

Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>

Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

We are **unable*** to accept service for Mmes. Ceparano and Russo. As such, they will need to be served.

Best,

Emanuel Kataev, Esq.

Partner

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From: Emanuel Kataev
Sent: Monday, January 22, 2024 2:25 PM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi, Rita:

I was away since Thursday and did not have an opportunity to respond to your email on Wednesday in the last-minute rush. I am available to meet-and-confer tomorrow at 3:30 PM regarding the below.

However, assuming you can produce the Plaintiff for an in-person deposition, we would be willing to accept service of the subpoena for Frank Russo Jr. and schedule a mutually convenient date. We are able to accept service for Mmes. Ceparano and Russo. As you know, we intend to take the deposition of Danielle Silva, who you have not willingly produced for a deposition and whose address you have still failed to provide despite due demand.

Regardless of whether you agree, we would need permission from the Court to proceed with depositions, as the deadline to do so has passed on January 15, 2024. We disagree with your interpretation of Judge Pollak's November 28, 2023, which clearly provides that depositions were to be so-Ordered following the submission of our letter as required by that Order.

Regards,

Emanuel Kataev, Esq.
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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Wednesday, January 17, 2024 9:00 AM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Emanuel,

Please advise when you are available to discuss outstanding discovery as promised to the court in my 12/4/23 status letter. I am available on Friday 1/19 after 3 PM or Monday 1/22 before 1:30 PM.

In addition, I am writing pursuant to our 1/11/24 email to confirm the following:

- depositions of Jaclyn Ceparano and Joanne Russo on, respectively, February 9 and 15;
- a firm deposition date from the following options for Frank Russo, Jr.: 1/16, 1/17, 1/18, 1/19, 1/22, 1/25 or 1/26; and
- whether you intend to take any other depositions.

After reviewing the Court's 11/28/23 order, it does not appear that Judge Pollak needs to so-order depositions, so we should plan to go forward with these dates. Please confirm.

Best,
Rita

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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Thursday, January 11, 2024 2:58 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel,

Thank you for the meet and confer today. As you requested, attached are subpoenas for Joanne Russo and Jaclyn Ceparano on the dates you agreed to, subject to the court's approval. Attached also is a subpoena for Frank Russo, Jr.; we have offered the following dates though the subpoena only permits me to list one: 1/16, 1/17, 1/18, 1/19, 1/22, 1/25 or 1/26 so please promptly confirm which is best, subject to the court's approval. You indicated you would represent all three of these witnesses.

In our conversation, I agreed to try to obtain Danielle Silva's address and confirmed that we are representing her. In addition, you indicated that you will confirm with Joe, but that you do not believe you want to take any additional depositions and that you are cancelling the deposition scheduled for tomorrow for Kalief Williams because you want an in-person deposition despite that he does not live in the tri-state area.

Based on your feedback about Mr. Vacca, Andrew will proceed with the deposition as scheduled for January 15 at 10 AM. We will forward you the Zoom link when we receive it.

Best,
Rita

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(she/hers)
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From: Emanuel Kataev <Emanuel@mllaborlaw.com>
Sent: Thursday, January 11, 2024 2:00 PM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi, Rita:

I am at (516) 303-1395 when you're ready. I have a 2:30 PM virtual court conference, FYI.

Thanks,

Emanuel Kataev, Esq.
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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Thursday, January 11, 2024 1:14 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Emanuel,

Per your email, 2 PM today works for a meet and confer. I will call you then.

Best,
Rita

Rita A. Sethi
(she/hers)

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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Thursday, January 11, 2024 11:57 AM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

I am available for a meet and confer between now and 2 PM. Please let me know via email what time you would like to meet and confer since I will not be next to the phone during that entire time period. Also advise if this time frame does not work for you.

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From: Emanuel Kataev <Emanuel@mllaborlaw.com>
Sent: Thursday, January 11, 2024 10:56 AM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi, Rita:

What is your availability to meet-and-confer today? Kindly provide all available times and we will respond.

Thanks and best,

Emanuel Kataev, Esq.
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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Wednesday, January 10, 2024 2:12 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel:

I am just seeing your email now. On Sunday, January 7, I emailed you with times this week when I could meet and confer. I offered yesterday at 2 PM and today at 12 PM. You did not respond to my email from Sunday until 11:15 AM today, so I no longer had 12 PM available and am not otherwise free today. I am available to meet and confer tomorrow any time from 9 AM -12 PM and can also make myself available later in the day if needed. Please advise as to your availability for tomorrow.

Mr. Williams will not appear in-person for a deposition on Friday because, among other reasons, he no longer lives in New York state. As I said in my email on Sunday, we should discuss this at our meet and confer.

Best,
Rita

Rita A. Sethi
(she/hers)
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From: Emanuel Kataev <Emanuel@mllaborlaw.com>
Sent: Wednesday, January 10, 2024 12:41 PM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi, Rita:

Please advise whether you are able to meet-and-confer at 1, 1:30, 2, or 2:30 today. If not, kindly confirm that Plaintiff will appear for his deposition at our office on Friday, January 12, 2024.

Thanks and best,

Emanuel Kataev, Esq.
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From: Emanuel Kataev
Sent: Wednesday, January 10, 2024 11:14 AM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi, Rita:

We are available at noon today. Kindly confirm and I will send calendar invitation with conference dial-in.

Best,

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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Sunday, January 7, 2024 10:43 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Some people who received this message don't often get email from rsethi@stollglickman.com. [Learn why this is important](#)

Hi Emanuel:

Sure, I am available to meet and confer to discuss and schedule all remaining depositions, including Danielle Silva's.

Plaintiff's Depositions

Frank Russo, Jr.: I am not sure how you didn't know we wanted to depose him since we made requests on December 4, January 2, January 3 and included the request in our status letter to Judge Pollak on December 4, 2023.

Jaclyn Ceparano: I am not sure how you didn't know we wanted to depose her since we noticed her deposition in August; discussed via email on September 20, October 5, October 27; discussed during our meet and confer and via email on November 8; via email on December 4, and included the request in our status letter to Judge Pollak on December 4, 2023.

Defendant's Depositions

Danielle Silva: you requested for the first time a deposition of Ms. Silve on this past Thursday, January 5

Kalief Williams: Plaintiff's deposition is scheduled for January 12, 2024. You notified us this past Wednesday that you would like to depose him in-person, which we will discuss when we meet and confer this week.

Let me know if either of these times work for a meet and confer: Tuesday 1/9 at 2 PM or Wednesday 1/10 at 12 PM. If these times don't work, please propose others.

Best,
Rita

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From: Emanuel Kataev <Emanuel@mllaborlaw.com>
Sent: Saturday, January 6, 2024 12:52 AM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Dear Rita:

Please provide your availability to meet and confer concerning Danielle Silva on Monday, January 8, 2024.

Best,

Emanuel Kataev, Esq.
Partner
Milman Labuda Law Group PLLC
3000 Marcus Avenue, Suite 3W8
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From: Emanuel Kataev
Sent: Thursday, January 4, 2024 4:57 PM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi, Rita:

When we confirmed deposition dates, we assumed that you only wanted to depose Defendants Robert Russo and Giuseppe Vacca. Unfortunately, we are not available on January 11 nor January 12 to depose Frank Russo, who is no longer a party in this case.

Separately, we write to confirm that Plaintiff Kalief William's deposition will proceed in person on Friday, January 12, 2024 at our office.

Finally, you produced an unnotarized affidavit from Danielle Silva in your Thursday, December 28, 2023 document production and referenced that affidavit during today's deposition of Defendant Robert Russo. We would like to depose her. Please advise as to whether you will voluntarily produce Danielle Silva and, if not, kindly provide her last known address and any other contact information in Plaintiff's position.

Thanks and best,

Emanuel Kataev, Esq.
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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Wednesday, January 03, 2024 4:29 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel:

Below is the link for Robbie's deposition tomorrow at 10 AM to share with your client as well.

Again, please advise if Frank Russo is available on January 10 or January 11 for his deposition and send the link for Kalief's deposition on January 12.

Thanks,
Rita

Topic: Williams vs The Russo's Payroll Group et al
Time: Eastern Time (US and Canada)

Join Zoom Meeting

<https://beereporting.zoom.us/j/81373886830?pwd=WaLd601qjaQxkDKvaUUxgvbaZ1atBF.1>

Meeting ID: 813 7388 6830
Passcode: 286554

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From: Rita Sethi <rsethi@stollglickman.com>
Sent: Tuesday, January 2, 2024 4:58 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel:

It is my understanding that all depositions are proceeding virtually. I will send you the links for Robbie Russo and Guiseppe Vacca when I receive them.

Please advise if Frank Russo is available on January 10 or January 11 for his deposition and send the link for Kalief's deposition on January 12.

Best,
Rita

Rita A. Sethi
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From: Emanuel Kataev <Emanuel@mllaborlaw.com>
Sent: Monday, January 1, 2024 6:14 PM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Dear Rita and Andrew:

Happy new year. I write to ascertain the format of depositions. I have not received any notice of deposition for Robert Russo, and a prior notice sent for another witness designated the deposition to proceed virtually. Kindly confirm.

Thanks and best,

Emanuel Kataev, Esq.
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